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69395-001

June 26, 2025

**Via ECF**

Honorable Vincent F. Papalia  
United States Bankruptcy Court  
50 Walnut Street  
Newark, New Jersey 07102

**Re: In the Matter of 703 Bakery Corp**  
**Chapter 11 – Subchapter V; 24-15150 (VFP)**

Dear Judge Papalia:

As you know, this firm is counsel to 703 Bakery Corp. (“Debtor”) in the above referenced mater. The Debtor confirmed its Chapter 11 Plan of Reorganization (“Plan”) on December 16, 2024. ECF 220.

On June 12, 2025, creditor Frank Gargiulo and Son Inc. d/b/a Gargiulo Produce (“Gargiulo”), through its attorney, filed the Creditor’s Certification of Default (“Certification”) ECF 261. The Certification states Debtor had failed to make monthly installments of \$1,913,61 [sic]<sup>1</sup> starting on March 1, 2025, as outlined in the Plan. On June 26, 2025, this firm, on behalf of the Debtor, mailed to Gargiulo a letter enclosing a check in the amount of \$7,654.44 representing installments for the months of March, April, May and June under the Plan. As the default has been cured, we respectfully request that the Certification be withdrawn.

Respectfully,

*/s/ Sari B. Placona*

Sari B. Placona

cc: Alla Kachan, Esq. (via email – [alla@kachanlaw.com](mailto:alla@kachanlaw.com))

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<sup>1</sup> Debtor believes the correct amount is \$1,913.61.